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9	UNITED STATES DISTRICT COURT	
10	DISTRICT OF NEVADA	
11		
12	TIMOTHY LUGER,) Case No. 2:17-cv-02839-GMN-GWF
13	Plaintiff,) Case No. 2:17-cv-02839-GMN-GWF
14	v.	STIPULATION TO EXTEND
15	THE UNITED STATES OF AMERICA,	SCHEDULING ORDER DEADLINES (First Request)
16	Defendant.))
17		,
18	Pursuant to Local Rules 6-1, 26-4, and Fed. R. Civ. P. 6(b), the parties stipulate, subject	
19	to this Court's approval, that the deadlines in the approved discovery schedule be extended as	
20	set forth below. The parties assert that good cause exists for the requested extension.	
21	1. <u>Status Report.</u> This request is made more than 21 days prior to the deadline to	
22	make initial expert disclosures, which is currently set for September 24, 2018 . This is a medica	
23	malpractice case. This request is made more than 21 days prior to expert disclosure deadlines,	
24	which are currently set for July 26, 2018.	
25	2. <u>Status/Discovery Completed</u> . The parties have further completed the following	
26	discovery:	
27	• Initial disclosures have been made pursuant to Fed. R. Civ. P. 26(a)(1)(C).	
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- depositions of fact witnesses and expert witnesses will be taken.
- 4. Reasons for extension. The parties request this extension to allow time to complete the depositions of necessary fact witnesses prior to the expert disclosure deadlines. Counsel for Plaintiff advises that he spends a portion of each year in the Philippines and that he will not return from the Philippines until August. The parties have been coordinating dates to conduct his deposition upon his return.

Discovery remaining. Additional written discovery may be made, and

- **5.** Revised discovery schedule. The parties stipulate and agree to a **45-day** extension of the discovery deadline. The parties agree to the following revisions to the discovery plan and ask that the Court adopt it as the revised scheduling order in this case.
- A. <u>Discovery Cutoff Date</u>: The parties agree and respectfully request that the discovery cutoff date be extended from **September 24, 2018** to **November 8, 2018**.
- B. <u>Expert Disclosures</u>: The parties agree and respectfully request that the Court approve an extension of the July 26, 2018 expert disclosure deadline to September 10*, 2018¹.
- C. <u>Rebuttal Experts</u>: The parties agree and respectfully request that the Court approve an extension of the **August 27, 2018** rebuttal expert disclosure deadline to **October 11, 2018**.
- D. <u>Interim Status Report</u>: The parties request that the Court extend the July 26, 2018 deadline to file an interim status report to September 10*, 2018, which is 60 days prior to the proposed discovery cutoff date.
- E. <u>Dispositive Motions</u>: The parties request that the Court extend the October 24, 2018 deadline to file dispositive motions, if any, to December 10*, 2018, which is 30 days after the proposed discovery cutoff.

¹ *Pursuant to Fed. R. Civ. P. 6(a)(C) deadlines falling on a weekend or legal holiday "run until the . . . next day that is not a Saturday, Sunday, or legal holiday."

1	F. <u>Pretrial Order</u> : The parties request that the Court extend the November		
2	23, 2018 deadline to file the Pretrial Order to January 9, 2019, which is 30 days after the		
3	deadline for filing dispositive motions. However, if any dispositive motions are filed, then the		
4	Pretrial Order shall be due 30 days after decisions on such motion(s). Disclosures under Fed. R.		
5	Civ. P. 26(a)(3) and any objections thereto shall be included in the Joint Pretrial Order.		
6	Respectfully submitted this 5th day of July 2018.		
7	SOLOW LAW GROUP, PLLC DAYLE ELIESON United States Attorney		
8	/s/ Rachel Solow /s/ Lindsy M. Roberts		
9	RACHEL SOLOW, ESQ. LINDSY M. ROBERTS		
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11	Henderson, Nevada 89074 Attorneys for the United States Attorney for Plaintiff		
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17	IT IS SO ORDERED:		
18	George Foley of		
19	UNITED STATES MAGISTRATE JUDGE		
20	DATED: <u>7/6/2018</u>		
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